

GHAJAR EXHIBIT 53

BOIES SCHILLER FLEXNER LLP

David Boies (*pro hac vice*)
333 Main Street
Armonk, NY 10504
(914) 749-8200
dboies@bsflp.com

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

Rachel Geman (*pro hac vice*)
250 Hudson Street, 8th Floor
New York, New York 10013-1413
(212) 355-9500
rgeman@lchb.com

JOSEPH SAVERI LAW FIRM, LLP

Joseph R. Saveri (SBN 130064)
601 California Street, Suite 1505
San Francisco, California 94108
(415) 500-6800
jsaveri@saverilawfirm.com

**CAFFERTY CLOBES MERIWETHER &
SPRENGEL LLP**

Bryan L. Clobes (*pro hac vice*)
135 S. LaSalle Street, Suite 3210
Chicago, IL 60603
(312) 782-4880
bclobes@caffertyclobes.com

DICELLO LEVITT LLP

Amy Keller (*pro hac vice*)
10 North Dearborn Street, Sixth Floor
Chicago, Illinois 60602
(312) 214-7900
akeller@dicellolevitt.com

Matthew Butterick (SBN 250953)
1920 Hillhurst Avenue, #406
Los Angeles, CA 90027
(323) 968-2632
mb@buttericklaw.com

*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

(Additional counsel on signature page)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' SUPPLEMENTAL
INITIAL DISCLOSURES
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 26**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Plaintiffs Richard Kadrey, Sarah Silverman, Christopher Golden, Ta-Nehisi Coates, Junot Díaz, Christopher Farnsworth, Andrew Sean Greer, David Henry Hwang, Matthew Klam, Laura Lippman, Rachel Louise Snyder, Jacqueline Woodson, and Lysa TerKeurst (“Plaintiffs”) make the following supplemental initial disclosures to Defendant Meta Platforms, Inc. (“Meta”).

PRELIMINARY STATEMENT

Plaintiffs make these initial disclosures based on information reasonably available to them at this time. Plaintiffs’ initial disclosures represent a good faith effort to identify information currently available to them that they reasonably believe is discoverable and supportive of their claims, as required by the Federal Rules of Civil Procedure. By making these disclosures, Plaintiffs do not represent they are identifying or producing every witness they may ultimately use in support of their allegations. In addition, it is possible some individuals listed here may not, in fact, possess significant information regarding the issues involved in this litigation, or may only have knowledge that is duplicative of knowledge possessed by others. Plaintiffs believe Meta possesses most of the documents and information that Plaintiffs will use to support their claims. Other documents and information are in the possession of third parties and are equally discoverable by Meta. Plaintiffs reserve the right to further amend, supplement, and/or correct these disclosures upon continuing investigation and discovery in accordance with Federal Rule of Civil Procedure 26(e). Further, Plaintiffs will submit a witness list at a time to be set by the Court.

Plaintiffs make these initial disclosures subject to and without waiving their right to protect from disclosure any attorney-client privileged documents and/or work product of their attorneys and other representatives, including, but not limited to, their mental impressions, conclusions, opinions, and/or legal theories. Plaintiffs further make these initial disclosures without waiving any right or opportunity to assert a claim or defense or to otherwise present, at any time in this lawsuit, information addressing facts and issues, other than those identified here.

Plaintiffs' initial disclosures are made without waiving in any way: (i) the right to object on the grounds of competency, privilege, relevancy and materiality, undue burden, hearsay, or any other proper ground, to the use of any such information, for any purpose, in whole or in part, in any subsequent proceeding in this action or any other action; and (ii) the right to object on any grounds, at any time, to any other discovery request or proceeding involving or relating to the subject matter of these disclosures.

Plaintiffs will produce information relating to experts as may be appropriate under Rule 26(a)(2) at the times provided by that Rule or by order of the Court.

Finally, Plaintiffs may further affirm, clarify, modify, or otherwise develop their claims in this lawsuit. Therefore, Plaintiffs reserve the right, at any time, to identify additional individuals, if any, that may have discoverable information pertinent to any such claims.

I. Rule 26(a)(1)(A)(i): Individuals Likely to Have Discoverable Information that Plaintiffs May Use to Support Their Claims or Defenses

Subject to the above reservations and objections, Plaintiffs believe the persons or entities listed below are likely to have discoverable information Plaintiffs may use to support their claims as alleged in the Second Amended Consolidated Complaint filed in this litigation. ECF No. 133.¹ Plaintiffs make no representations as to the extent of knowledge of these individuals. This is a preliminary list based upon the information known to Plaintiffs at this time. Plaintiffs retain the right to modify or supplement this list as the circumstances may warrant and as otherwise permitted by the Court. All disclosures are made without waiver of any applicable privileges or other objections to the use or production of information or knowledge held by these people or entities.

At this time, Plaintiffs have ascertained that specific individuals or entities possessing discoverable information include, but are not limited to, at least the following:

¹ Plaintiffs have moved for leave to file a Third Amended Consolidated Complaint, ECF No. 300. If granted, these Supplemental Initial Disclosures also will be used to support the claims alleged in that complaint.

Name	Subject Matter / Description
Richard Kadrey, Sarah Silverman, Christopher Golden, Ta-Nehisi Coates, Junot Díaz, Christopher Farnsworth, Andrew Sean Greer, David Henry Hwang, Matthew Klam, Laura Lippman, Rachel Louise Snyder, Jacqueline Woodson, and Lysa TerKeurst	Plaintiffs with knowledge of the conception, creation, modification, distribution, ownership, licensing, and assignment of his or her works at issue in this case; his or her communications, if any, with Meta; Rule 23(a) requirements; causation; and damages.
Acharya, Amrish	Finance director with information and documents concerning financial information regarding, and investment in, the Llama Models.
Agsen, Mohsen	Engineer with knowledge of conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Al-Dahle, Ahmad	VP of Gen AI, with knowledge of the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Andreesen, Mark	Board member knowledgeable regarding licensing in the context of AI development.
Anzano, Elisa	Part of the AI Business Development team, knowledgeable of outreach to content owners regarding potential licensing opportunities.
Unknown individuals associated with Apple Inc.	Knowledge of development of LLM model(s) that competes with one or more Meta Language Models; potential authentication of documents.
Awkwafina	Third party who reportedly entered a deal with respect to one or more of the LLM's features.
Bass, Joe	Engineering manager knowledgeable about the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Bashlykov, Nikolay	Research engineer knowledgeable about downloading, torrenting, and analyzing

	LibGen, along with other third-party datasets used in connection with Llama Models.
Bell, Kristen	Third party who reportedly entered a deal with respect to one or more of the LLM's features.
Bell, Sean	Technical lead on the GenAI Data Team with knowledge concerning Llama training data acquisition, storage, curation, evaluation, use and strategy.
Biderman, Stella	Third party with knowledge of The Pile.
Bjorlin, Alexis	Former vice president of infrastructure at Meta knowledgeable about Meta AI efforts and training.
Blecher, Lukas	Machine Learning Engineer knowledgeable about the processing of relevant and high-quality data from books in connection with Llama Models.
Boesenberg, Alex	Part of the AI Business Development team knowledgeable about outreach to content owners to potential licensing opportunities and efforts.
Bosworth, Andrew	CTO of Meta knowledgeable about the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Brown, Campbell	Former Vice President of Media Partnerships knowledgeable about third-party licensing and ethical considerations of Meta's practices.
Capuchino, Carolyn	Executive assistant to VP of Generative AI. knowledgeable about the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Carmack, John	Former employee knowledgeable about the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.

Cena, John	Third party who reportedly entered a deal with respect to one or more of the LLM's features.
Chen, Moya	Former research engineer at FAIR ("Fundamental AI Research") knowledgeable about the downloading and processing of LibGen and other third-party datasets.
Choudhury, Sy	Member of AI Business Development team knowledgeable about Meta's long term open-source and commercial license strategy for Llama, including future releases, licensing and commercial efforts around LLMs and AI generally, and ethical considerations of Meta practices.
Clark, Mike	Director of product management, knowledgeable about the information and documents concerning development of Llama Models; and risk and safety policies related to Llama Models and implementation of the same.
Clegg, Nick	President of global affairs for Meta, knowledgeable about the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Connie Carlos, Anna	Meta employee knowledgeable about the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Cox, Chris	Chief Product Officer at Meta knowledgeable about how large language models actually/potentially function within Meta's business plan, the monetization strategy related to Llama, and the integration of Llama into Meta's commercial products, platforms and tools.
Unknown individuals associated with Created by Humans	Third Party knowledgeable about and engaged in the business of collectively licensing copyrighted works to AI companies.
Crowson, Katherine	Third party knowledgeable of EleutherAI's activities in connection Llama Models and/or datasets used to train any Llama Models,

	including but not limited to conception, creation, training, modification.
Dench, Judi	Third party who reportedly entered a deal with respect to one or more of the LLM's features.
Deo, Nisha	Marketing & Communications Director at Meta, knowledgeable about decisions on how to handle public messaging of Meta's use of pirated copyrighted materials for AI training.
Dettmers, Tim	Former employee who communicated with third party EleutherAI regarding the propriety of the Books 3 data source, known to contain pirated works.
Edunov, Sergey	Director of Engineering at Meta, knowledgeable regarding the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Esiobu, David	Software Engineer at Meta, knowledgeable of Meta's processes for torrenting LibGen and other third party datasets in connection with Llama Models, memorization issues, and Meta's processes for training Llama Models.
Unknown individuals associated with EleutherAI	Third Party knowledgeable of its activities in connection with Llama Models and/or datasets used to train any Llama Models, including but not limited to conception, creation, training, and/or modification; potential authentication of documents.
Unknown individuals associated with Elsevier	Third party knowledgeable about Meta's attempts to license training data; and potential authentication of documents.
Fan, Angela	Research scientist at Meta. Knowledgeable regarding the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models, including dataset selection and risk mitigations.
Gamido, Brian	Part of the AI Business Development team, knowledgeable about outreach to content

	owners and potential licensing opportunities and efforts.
Ginsberg, Josh	VP of corporate marketing for Meta, knowledgeable about marketing of the Llama Models.
Unknown individuals associated with GitHub, Inc.	Knowledge of development of LLM model(s) that competes with one or more Meta Language Models; potential authentication of documents.
Goler, Lori	Head of People at Meta, knowledgeable about the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Gonchar, Maxim	Third Party knowledgeable about EleutherAI's activities in connection with Llama Models and/or datasets used to train any Llama Models, including but not limited to conception, creation, training, and/or modification.
Grosul, Anna	Product manager at Meta, tech lead on data licensing team with knowledge about execution of licensing with business development.
Unknown individuals associated with Google	Knowledge of development of LLM model(s) that competes with one or more Meta Language Models; potential authentication of documents.
Grave, Edouard	Former employee at Meta, knowledgeable about competitors' use of books in connection with LLMs.
Unknown individuals associated with Hachette Book Group	Third party with knowledge of Meta's and other companies' attempts to license literary works and training data in connection with LLMs; registration of Plaintiffs' works; licensing of works and training data, generally; and potential authentication of documents.
Hamlin, Drew	Conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.

Unknown individuals associated with Harper Collins	Third party with knowledge of Meta's and other companies' attempts to license literary works and training data in connection with LLMs; registration of Plaintiffs' works; licensing of works and training data, generally; and potential authentication of documents.
Hayes, Conor	VP, Generative AI with knowledge of conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Heafield, Kenneth	Meta Research Scientist Manager consulted by Mike Clark for Rule 30(b)(6) deposition preparation; tech lead on web crawling team knowledgeable about text data acquisition and curation, including use of third party datasets.
Hegeman, John	Vice President, Monetization with knowledge of Llama's commercial applications
Unknown executives, employees, contributors, and participants with Hugging Face	Knowledgeable of the constitution and other information regarding datasets used to train any Llama Models. Other details about Llama Models and/or datasets used to train any Llama Models; potential authentication of documents.
Janardhan, Santosh	Head of Global Infrastructure at Meta with knowledge of Meta's AI infrastructure.
Jhaveri, Ash	Vice President at Meta with knowledge of licensing efforts for Llama training data and commercial partnerships for Llama.
Joulin, Armand	Part of management team responsible for the development of Llama Models. Knowledge concerning the training sets and/or data used to create Llama Models.
Kallet, Amanda	Part of the AI Business Development team. Knowledgeable about Meta's potential licensing opportunities and discussions with content owners.
Kambadur, Melanie	Research engineering manager knowledgeable about the background, development, and use of Llama Models,

	including dataset selection and risk mitigations.
Kaur, Parkash	Knowledgeable about the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Kerr, Logan	Product manager with knowledge regarding use cases, copyright risks, and memorization risk.
Key, Keegan-Michael	Third party who reportedly entered a deal with respect to one or more of the LLM's features.
Kofman, Irina	Knowledgeable about conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Lample, Guillaume	Former Research Scientist at FAIR with knowledge of the books in Meta's training dataset.
LeCun, Yann	Chief AI scientist with knowledge of Large Language Models, decision-making around changes to practices of disclosing training data in Llama Models and Llama marketing, and Meta products.
Li, Susan	CFO at Meta with knowledge of the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Loulier, Benjamin	Director of engineering at Meta with knowledge of the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Ma, Hao	Director within Meta Generative AI with knowledge regarding the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Unknown individuals associated with MacMillan Publishers	Third party with knowledge of Meta's and other companies' attempts to license literary works and training data in connection with LLMs; registration of Plaintiffs' works; licensing of works and training data,

	generally; and potential authentication of documents.
Mahajan, Dhruv	Research director at Meta with knowledge regarding the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Martinet, Xavier	Research engineer at Meta familiar with knowledge of Meta's decision to use pirated materials rather than paying for licenses.
Unknown executives and employees of Meta	Knowledgeable of the funding, conception, creation, distribution, constitution, and other information regarding Llama Models and/or datasets used to train any Llama Models; potential authentication of documents.
Metanat, Movarid	Director and AGC, AI Product. Knowledgeable about IP and ethical issues related to AI.
Meyer, Michael	Group product manager knowledgeable about Core Learning and Reasoning within FAIR.
Unknown individuals associated with Microsoft	Knowledge of development of LLM model(s) that competes with one or more Meta Language Models; potential authentication of documents.
Mihaylov, Todor	Research engineer knowledgeable about downloading and analyzing LibGen and other pirated third party datasets.
Mohan, Vijai	Engineer with knowledge of the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Murray Manning, Erin	Former Head of Thought Leader Partnerships knowledgeable about of licensing efforts, datasets used for training Llama, and AI ethical considerations.
Nayak, Chaya	Director of Product Management possessing information and documents concerning background, development, and use of Llama Models by Meta; risk and safety policies related to Llama and implementation of the

	same; integration of Llama into Meta products.
Neverova, Natalia	Research lead and manager at Meta with knowledge of the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
The New York Times	Third party with knowledge of Meta's attempts to license training data; facts reported in an article entitled "How Tech Giants Cut Corners to Harvest Data for A.I."; potential authentication of documents.
Newstead, Jennifer	Chief Legal Officer with knowledge of the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Nguyen, Traci	Senior Product Manager with knowledge of the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Nho, Eugene	Direct of Product, Generative AI with knowledge of Meta's Llama data strategy, including the acquisition, curation, evaluation and use of data used to train Llama models.
Olivan, Javier	Chief Operating Officer of Meta knowledgeable about the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Unknown individuals associated with OpenAI	Knowledge of development of LLM model(s) that competes with one or more Meta Language Models; potential authentication of documents.
Orsborn, Molly	GenAI Business Lead knowledgeable about the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Pak, Jennifer	Counsel with knowledge of intellectual property risks in Generative AI at Meta.
Paluri, Manohar	VP, AI with knowledge of the conception, creation, training, and/or modification of

	Llama Models and/or other Meta Language Models.
Parikh, Devi	Computer scientist with knowledge of the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Unknown individuals associated with Penguin Random House	Third party with knowledge of Meta's and other companies' attempts to license literary works and training data in connection with LLMs; registration of Plaintiffs' works; licensing of works and training data, generally; and potential authentication of documents.
Pesenti, Jérôme	Former employee with knowledge regarding the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Pineau, Joelle	VP of AI research knowledgeable about the background, development, and release of Llama Models; Llama open license approach; artificial intelligence and neural networks; natural language processing; large language models; oversight of FAIR team, including regarding Llama.
Presani, Eleonora	Researcher knowledgeable about Meta's Llama training datasets who has voiced concerns about the use of pirated material.
Presser, Shawn	Third party with knowledge of the datasets used to train the Llama Models.
Rao, Arun	Lead product manager for Generative AI at Meta with knowledge of AI product uses.
Reis, Affonso	Director of data science with knowledge of the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Rodriguez, Aurelien	Former Software Engineering Manager with knowledge of the background, development, and use of Llama Models by Meta; management and oversight of development of Llama Models; benchmarking tests.

Roller, Steven	Former research engineer knowledgeable about the background, development, and use of Llama Models.
Salem, Hadi Michel	Researcher with knowledge of the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Scialom, Thomas	Researcher with knowledge of post-training and fine-tuning Llama; agents and LibGen projects; and competitors' development of LLMs and catching up to competition and "clean up" of "problematic data."
Scissors, Lauren	Director of research, knowledgeable about the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Shedroff, Mark	Vice President, Business Development and Alliances with knowledge of Meta's long term open-source and commercial license strategy for Llama, including future releases.
Unknown individuals associated with Simon & Schuster	Third party with knowledge of Meta's and other companies' attempts to license literary works and training data in connection with LLMs; licensing of works and training data, generally; and potential authentication of documents.
Unknown individuals associated with Springer Science + Business Media	Third party with knowledge of Meta's and other companies' attempts to license literary works and training data in connection with LLMs; licensing of works and training data, generally; and potential authentication of documents.
Srinivasan, Ragavan	Head of product at Facebook AI with knowledge of conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Sumbaly, Roshan	Director of AI with knowledge of the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Touvron, Hugo	Research Scientist at Meta with knowledge of information and documents concerning

	background, development, and use of Llama Models by Meta, including model design architecture, and fine-tuning.
van der Maaten, Laurens	Research scientist with knowledge of the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Vapnick, Vladimir	Third party with knowledge regarding the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Wang, Frank	Software Engineer with knowledge of Meta's acquisition of third-party training datasets, including via torrenting and seeding.
Wang, Xiaolan	Software Engineer with knowledge of Meta's acquisition of third-party training datasets, including via torrenting and seeding.
Wehner, Dave	Chief Strategy Officer of Meta, knowledgeable of the creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Xu, Jacob	Researcher with knowledge of Meta's acquisition of third-party training datasets.
Zettlemoyer, Luke	Research director at FAIR with knowledge of the development of Llama Models and training data.
Zhang, Frank	Member of data team with knowledge of prioritization and acquisition strategy for pre-training Llama Models.
Zhang, Susan	Former employee at Meta knowledgeable of the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Zhao, Haiping	Engineer at Meta knowledgeable of the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.

Zuckerberg, Mark	Meta's CEO. Knowledgeable about the conception, creation, training, and/or modification of Llama Models and/or other Meta Language Models.
Zvi, Tali	Director of engineering at Meta, knowledgeable of the creation, training, and/or modification of Llama Models and/or other Meta Language Models.

Plaintiffs also identify other current and former Meta executives and employees not yet known with discoverable information regarding the creation and operation of Llama Models, including but not limited to training Llama Models, compliance, acquisition strategy, negotiation, torrenting, and open-source licensing.

Plaintiffs also identify as persons with discoverable information, any and all witnesses needed to authenticate documents or other evidence at issue in the litigation.

In addition, Plaintiffs identify Meta, including but not limited to additional officers, directors, employees, agents not listed above, and additional officers, directors, employees and agents of subsidiaries, whose identities are known only to Defendant and are likely to possess discoverable information.

Plaintiffs believe the above-mentioned individuals and entities are likely to have discoverable information that Plaintiffs may use to support their claims on one or more of the following subjects:

- Whether Meta violated the copyrights of Plaintiffs and the Class when they downloaded copies of the Works.
- Whether Meta violated the copyrights of Plaintiffs and the Class when they used copies of the Works to train and develop the Llama Models (including but not limited to pre-training, testing, fine-tuning, etc.).
- The willfulness of Meta's conduct with respect to Plaintiffs' and Class members' copyrights.

- Meta’s unauthorized use of Plaintiffs’ and the Class’s works in connection with Llama Models.
- Meta’s conduct in concealing attribution information regarding Class members’ (including Plaintiffs’) works from users of Llama Models.
- Whether Meta violated the DMCA by removing CMI from the Works and/or causing Llama Models to omit CMI from Output.
- Whether Meta violated CDAFA by taking, copying, or making use of data from a computer, computer system, or computer network without permission.
- Whether Llama Models are being used by Meta to engage in Unfair Competition under California law.
- Meta’s agreements to indemnify, defend, or hold harmless any third-parties for claims resulting from the use of any Llama Models.
- Agreements to indemnify Meta for claims resulting from the indemnifying party’s use of any Llama Models.
- Whether Meta behaved negligently, carelessly, and/or recklessly when collecting, maintaining and/or controlling Plaintiffs’ and Class’s copyright protected works in connection with Llama Models.
- The value of Plaintiffs’ and Class members’ works.
- The use and value of books and long-form text in Llama Models.
- Whether this Court should enjoin Meta from engaging in the unlawful conduct alleged herein, and what the scope of that injunction would be.
- Facts related to affirmative defenses raised by Meta.
- The interactions between Class members (including Plaintiffs) and Meta.
- Whether Meta obtained licenses or other forms of agreement permitting use of any or all of Plaintiffs’ and the Class’s works used to train Llama Models and the details of such agreements.

- The foregoing list of subject matter areas is not exhaustive and is offered without prejudice to Plaintiffs' right to obtain information from Meta allowable under the Federal Rules of Civil Procedure.
- Additional information may be provided in amended disclosures after further investigation and discovery that this Court may allow in the wake of rulings on pending motions.

II. Rule 26(a)(1)(A)(ii): Documents and Information That Plaintiffs May Use to Support Their Claims or Defenses

Subject to the above reservations and objections, including Plaintiffs' right to modify, supplement, and/or clarify their responses, Plaintiffs, through counsel, represent Plaintiffs have in their possession, custody, or control the following categories of documents, electronically stored information, and tangible things: files, documents, communications, and data regarding (a) their works, including their creation, registration, and/or ownership of those works; and (b) their communications with Meta regarding their works.

These documents will be made available for production, inspection, or copying in response to any Rule 34 requests for the production of documents served upon Plaintiffs by Meta, according to a schedule to be agreed to by the parties, and, where appropriate, subject to the terms of the Stipulated Protective Order, if any.

Additional documents that Plaintiffs may use to support their claims are likely in the possession, custody, or control of Meta. Other documents Plaintiffs may use to support their claims are in the possession, custody, or control of third parties and are equally subject to discovery by Meta. Plaintiffs disclose they may use any documents produced by any party in this litigation to prove their claims.

III. Rule 26(a)(1)(A)(iii): Computation of Plaintiffs' Damages

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iii), Plaintiffs provide the following information regarding damages claimed by them. Plaintiffs seek, on behalf of themselves and the class they seek to represent, all compensatory, statutory, restitution, and/or punitive damages, injunctive

and equitable relief, and other relief to which they are entitled under 17 U.S.C. §§ 502-504 and 1203(c), and any other applicable law. Plaintiffs also seek attorneys' fees, costs, and expenses in accordance with 17 U.S.C. §§ 505 and 1203(b)(4) and (5), as well as any other relief deemed appropriate by the Court.

A complete computation of damages may only be made after a review of Meta's and third parties' records and data, as well as analysis by Plaintiffs' expert(s). Plaintiffs expect that damages, once so computed, may exceed \$10 billion. Plaintiffs will provide a more definitive statement of damages at the appropriate time as set forth by the Court in the schedule for the case and in conformance with Rule 26(e), after review of Meta's and third parties' data and records and production of Plaintiffs' experts' damage report(s).

IV. Rule 26(a)(1)(A)(iv): Insurance

Not applicable to Plaintiffs.

Dated: December 13, 2024

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

Elizabeth J. Cabraser (State Bar No. 083151)
Daniel M. Hutchinson (State Bar No. 239458)
Reilly T. Stoler (State Bar No. 310761)
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
(415) 956-1000
ecabraser@lchb.com
dhutchinson@lchb.com
rstoler@lchb.com

Rachel Geman (*pro hac vice*)
250 Hudson Street, 8th Floor
New York, New York 10013-1413
(212) 355-9500
rgeman@lchb.com

JOSEPH SAVERI LAW FIRM, LLP

Joseph R. Saveri (SBN 130064)
Cadio Zirpoli (SBN 179108)
Christopher K.L. Young (SBN 318371)
Holden Benon (SBN 325847)
Aaron Cera (SBN 351163)
601 California Street, Suite 1505
San Francisco, California 94108
(415) 500-6800
jsaveri@saverilawfirm.com
czirpoli@saverilawfirm.com
cyoung@saverilawfirm.com
hbenon@saverilawfirm.com
acera@saverilawfirm.com

**CAFFERTY CLOBES MERIWETHER &
SPRENGEL LLP**

Bryan L. Clobes (*pro hac vice*)
135 S. LaSalle Street, Suite 3210
Chicago, IL 60603
(312) 782-4880
bclobes@caffertyclobes.com

BOIES SCHILLER FLEXNER LLP

David Boies (*pro hac vice*)
333 Main Street
Armonk, NY 10504
(914) 749-8200
dboies@bsflp.com

Maxwell V. Pritt (SBN 253155)
Joshua M. Stein (SBN 298856)
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
(415) 293-6800
mpritt@bsflp.com
jstein@bsflp.com

Jesse Panuccio (*pro hac vice*)
1401 New York Ave, NW
Washington, DC 20005
(202) 237-2727
jpanuccio@bsflp.com

Joshua I. Schiller (SBN 330653)
David L. Simons (*pro hac vice*)
55 Hudson Yards, 20th Floor
New York, NY 10001
(914) 749-8200
jischiller@bsflp.com
dsimons@bsflp.com

*Interim Lead Counsel for Individual and
Representative Plaintiffs and the Proposed
Class*

DICELLO LEVITT LLP

Amy Keller (*pro hac vice*)
Nada Djordjevic (*pro hac vice*)
James Ulwick (*pro hac vice*)
10 North Dearborn Street, Sixth Floor
Chicago, Illinois 60602
(312) 214-7900
akeller@dicellolevitt.com
ndjordjevic@dicellolevitt.com
julwick@dicellolevitt.com

David Straite (*pro hac vice*)
485 Lexington Avenue, Suite 1001
New York, New York 10017
(646) 933-1000
dsraite@dicellolevitt.com

Matthew Butterick (SBN 250953)
1920 Hillhurst Avenue, #406
Los Angeles, CA 90027
(323) 968-2632
mb@buttericklaw.com

*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

CERTIFICATE OF SERVICE

I, the undersigned, am employed by the Joseph Saveri Law Firm, LLP. My business address is 601 California Street, Suite 1505, San Francisco, California 94108. I am over the age of eighteen and not a party to this action.

On December 13, 2024, I caused the following documents to be served by email upon the parties listed on the attached Service List:

- **PLAINTIFFS' SUPPLEMENTAL INITIAL DISCLOSURES PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26**

I declare under penalty of perjury that the foregoing is true and correct. Executed December 13, 2024, at San Francisco, California.

By: *Rya Fishman*
Rya Fishman

SERVICE LIST

Bobby A. Ghajar
Colette Ani Ghazarian

COOLEY LLP

1333 2nd Street, Suite 400
Santa Monica, CA 90401
Email: bghajar@cooley.com
cghazarian@cooley.com

zmetakadrey@cooley.com

*Counsel for Defendant
Meta Platforms, Inc.*

Kathleen R. Hartnett

COOLEY LLP

3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Email: khartnett@cooley.com

Judd D. Lauter

Elizabeth Lee Stameshkin

Juan Pablo Gonzalez

COOLEY LLP

3175 Hanover Street
Palo Alto, CA 94304
Email: jlauter@cooley.com
lstameshkin@cooley.com
jgonzalez@cooley.com

Cole Augustus Poppell

Phillip Edward Morton

COOLEY LLP

1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004-2400
(202) 776-2317
Fax: (202) 842-7899
Email: cpoppell@cooley.com
pmorton@cooley.com

Mark Alan Lemley

LEX LUMINA PLLC

745 Fifth Avenue, Suite 500
New York, NY 10151
Email: mlemley@lex-lumina.com

Angela L. Dunning

**CLEARY GOTTlieb STEEN &
HAMILTON LLP**

1841 Page Mill Road
Palo Alto, CA 94304-1254
Email: adunning@cgsh.com